

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**JILL DILLARD, JESSA SEEWALD,
JINGER VUOLO, and JOY DUGGAR**

PLAINTIFFS

vs.

CASE NO. 5:17-5089-TLB

**CITY OF SPRINGDALE, ARKANSAS;
WASHINGTON COUNTY, ARKANSAS;
KATHY O'KELLEY, in her individual and
official capacities;
ERNEST CATE, in his individual and official capacities;
RICK HOYT, in his individual and official capacities;
STEVE ZEGA, in his official capacity;
And DOES 1-10, inclusive**

DEFENDANTS

DECLARATION OF TANDRA BARNFIELD

I, Tandra Barnfield, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18 and have personal knowledge of the information set forth in this Declaration.
2. I am from Houston, Texas, but have several family members that live in Springdale, Arkansas. I have personal knowledge that information regarding Josh Duggar's molestation of his sisters and a babysitter were well known throughout the community in Northwest Arkansas before the release of the Springdale police report regarding Josh Duggar in May of 2015.
3. On or about January 10, 2015, my sister, Sherri Colville (a/k/a Sherri Townsend), took a picture of Samantha Muzny and me kissing in front of the Duggar residence and posted the photograph on the Duggar Facebook page. Samantha Muzney was my girlfriend at the time, and we posted this photograph in response to Michelle Duggar's public opposition to the City of Fayetteville's anti-discrimination ordinance as well as a request by Michelle Duggar for couples



to post pictures of themselves kissing to their Facebook page. Sherri Colville, Samantha Muzny and I posted the photograph on various social media pages.

4. Sherri Colville and I were both contacted by members of the press as to the reason this picture was receiving so much attention.

5. Information regarding Josh Duggar and the molestation of his sisters that had occurred a number of years prior to when we posted this viral photograph was told to me by Sherri Colville, who mentioned had recently been contacted by a friend who was a former high school teacher. The friend was talking to her about the Josh Duggar molestation incidents, and I recall that Sherri Colville told me at that time that she had heard about these molestations before that as well.

6. Soon thereafter, I was contacted by *In Touch Weekly* reporter, Melissa Roberto, regarding the viral photograph that we had posted on the internet. I informed Melissa Roberto about the molestation allegations involving Josh Duggar. From my conversation with Melissa Robert, I understand that she wanted more information about the Josh Duggar molestation incidents and so I told her that she should contact Sherri Colville for more details of this story.

7. A number of days after these conversations that I have described above, *In Touch Weekly* published its first story about the molestation accusations. Following the publication of the stories about Josh Duggar in *In Touch Weekly*, I have talked to many people who have informed me that they were aware of the molestation incidents before the publication of the *In Touch Weekly* stories about Josh Duggar.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: October 5, 2021



Tandra Barnfield